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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 LOS ANGELES WATERKEEPER,

20 Plaintiff,

21 vs.

22 ACCURATE STEEL TREATING, INC.,

23 Defendant.

Case No. 2:24-cv-07503-MWC-SSC

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO COMPEL FURTHER
RESPONSES TO REQUESTS FOR
PRODUCTION OF DOCUMENTS**

*[Filed concurrently with Declaration of William
Carlon]*

Date: September 9, 2025

Time: 1:30 p.m.

Discovery Cutoff: September 12, 2025

1 TO DEFENDANT ACCURATE STEEL TREATING, INC., AND ITS ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE that on September 9, 2025 at 1:30 p.m., or as soon thereafter as
4 the matter can be heard, at the United States Federal Court in the Central District of California, in
5 the courtroom of the Honorable Magistrate Judge Stephanie Christensen, located at the Roybal
6 Federal Building and United States Courthouse, 255 E. Temple St., Los Angeles, CA, 90012,
7 Courtroom 790, 7th Floor, Plaintiff Los Angeles Waterkeeper ("LA Waterkeeper") will, and
8 hereby does, move for an order granting LA Waterkeeper's Motion to Compel Further Responses
9 to Requests for Production of Documents ("Motion") and ordering Defendant to respond in a
10 manner consistent with LA Waterkeeper's requests issued to Defendant on November 11, 2024.

11 The parties have met and conferred many times, via video conference as well as email and
12 in person, and have prepared a joint stipulation setting forth each party's respective position on
13 each discovery request in dispute. Having been unable to resolve the issues, Plaintiff now seeks
14 assistance from the Court.

15 LA Waterkeeper further moves, pursuant to Federal Rule of Civil Procedure 37(a)(4), for
16 a court order requiring Defendant to pay LA Waterkeeper's reasonable expenses, including
17 attorneys' fees, incurred by LA Waterkeeper in bringing this motion. The motion is based on this
18 Notice of Motion and Motion, the Declaration of William Carlon in support thereof, and the Joint
19 Statement Re Discovery Dispute filed concurrently, all of the files and records in this action, and
20 any additional material that may be elicited at the hearing of this motion.

21 Dated: August 12, 2025

Respectfully Submitted,

22 LAW OFFICE OF WILLIAM CARLON

23 By: /s/ William N. Carlon

24 William N. Carlon
25 Attorneys for Plaintiff
26 LOS ANGELES WATERKEEPER
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